

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

DENNIS GROMOV, individually and on	)	
behalf of all other similarly situated,	)	
	)	
Plaintiff,	)	Case No. 1:22-cv-06918
	)	
v.	)	Hon. Franklin U. Valderrama
	)	
BELKIN INTERNATIONAL, INC.,	)	
	)	
Defendant.	)	

**DEFENDANT BELKIN INTERNATIONAL, INC.’S SUPPLEMENTAL OBJECTIONS  
AND RESPONSES TO PLAINTIFF’S INTERROGATORY NO. 2**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, and the Court’s October 10, 2023 Order (Dkt. 56), Defendant Belkin International, Inc., (“*Belkin*”), by and through its undersigned counsel, hereby supplements its answer to Plaintiff’s First Set of Interrogatories with respect to Interrogatory No. 2. For convenience, Belkin reinstates its original answer to Interrogatory No. 2.

**INTERROGATORY RESPONSE**

2. Identify any power bank that Belkin described in interrogatory no. 1, which Belkin contends is not substantially similar to all other Belkin power banks, with respect to either (1) basic internal design, (2) basis for making charging statements, or (3) the fact that output energy and stated capacity are different.

**ORIGINAL RESPONSE:** Belkin incorporates by reference the General Objections set forth above. In addition, Belkin objects to this Request because it is overbroad and unduly burdensome. In addition, Belkin objects that the term substantially similar is vague and ambiguous. This Request also seeks information that is neither relevant to the claims or defenses of any party, nor proportional to the needs of the case. Plaintiff alleges that he purchased one Belkin battery pack, the Pocket Power 10K. He therefore lacks standing to assert claims based on any other Belkin battery pack (of which there are over two dozen),

and discovery as to these other unpurchased products would be improper.

**SUPPLEMENTAL RESPONSE:** Belkin objects that the term “substantially similar” is vague and ambiguous. Subject to and without waiving its objections, Belkin answers this interrogatory and states as follows:

The following Belkin power banks are not substantially similar to the Pocket Power 10K that Plaintiff purchased because they contain USB-C charging ports:

Boost↑Charge™ Power Bank 5K;

The Belkin Boost↑Charge™ Power Bank 10K Portable Power;

BoostCharge Plus Power Bank 10K with Integrated Cables;

BoostCharge Power Bank 10K;

BoostCharge Power Bank 20K;

Belkin BoostCharge 3-Port Power Bank 10K; and

BoostCharge Magnetic Wireless Power Bank

The following Belkin power banks are not substantially similar to the Pocket Power 10K that Plaintiff purchased because they contain lightning charging ports:

Belkin BoostCharge Power Bank 5K with Lightning Connector; and

Belkin BoostCharge Power Bank 10K with Lightning Connector

The following Belkin power banks are not substantially similar to the Pocket Power 10K that Plaintiff purchased because, without limitation, they contain different electrical components (circuitry board, battery management chips, etc.):

Boost↑Charge™ Power Bank 5K;

The Belkin Boost↑Charge™ Power Bank 10K Portable Power;

Belkin BoostCharge Power Bank 5K with Lightning Connector;

Belkin BoostCharge Power Bank 10K with Lightning Connector;

BoostCharge Plus Power Bank 10K with Integrated Cables;

BoostCharge Power Bank 10K;

BoostCharge Power Bank 20K;

Belkin BoostCharge 3-Port Power Bank 10K; and

BoostCharge Magnetic Wireless Power Bank

The following Belkin power banks are not substantially similar to the Pocket Power 10K that Plaintiff purchased because, without limitation, the internal design differs:

Boost↑Charge™ Power Bank 5K;

The Belkin Boost↑Charge™ Power Bank 10K Portable Power;

Belkin BoostCharge Power Bank 5K with Lightning Connector;

Belkin BoostCharge Power Bank 10K with Lightning Connector;

BoostCharge Plus Power Bank 10K with Integrated Cables;

BoostCharge Power Bank 5K;

BoostCharge Power Bank 10K;

BoostCharge Power Bank 20K;

Belkin BoostCharge 3-Port Power Bank 10K; and

BoostCharge Magnetic Wireless Power Bank

The following Belkin power banks are not substantially similar to the Pocket Power 10K that Plaintiff purchased because, without limitation, the product packaging does not contain the statement “charge up to 3 times”:

Boost↑Charge™ Power Bank 5K;

The Belkin Boost↑Charge™ Power Bank 10K Portable Power;

Belkin BoostCharge Power Bank 5K with Lightning Connector;  
Belkin BoostCharge Power Bank 10K with Lightning Connector;  
BoostCharge Plus Power Bank 10K with Integrated Cables;  
BoostCharge Power Bank 5K;  
BoostCharge Power Bank 10K;  
BoostCharge Power Bank 20K;  
Pocket Power 5K Power Bank (aka Portable Charger);  
Belkin BoostCharge 3-Port Power Bank 10K; and  
BoostCharge Magnetic Wireless Power Bank

Belkin answers this interrogatory to the best of its knowledge based on information known to it at this time. If appropriate, Belkin will amend or supplement this interrogatory consistent with its obligations under Fed. R. Civ. P. 26.

Dated: October 26, 2023

Respectfully submitted,

By: /s/ Katelyn VanDoorne

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